November 19, 2009

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: PS Docket No. 07-114 (Accuracy Standards for Wireless E-911 Calls)

Dear Madame Secretary:

On behalf of the Executive Board and membership of the Pennsylvania chapter of the Association of Public-Safety Communications Officials-International ("PA APCO"), I am pleased to have the opportunity to submit these comments in the above-referenced docket (the "Docket"). PA APCO fully supports the comments and efforts of APCO International, Inc. ("APCO") in this Docket, and we would like to give the Commission the additional benefit of a few of our observations from the front lines in PSAPs across Pennsylvania's 67 counties.

PA APCO represents one of the largest memberships among APCO chapters, and our great Commonwealth is a microcosm of the wireless E-9-1-1 challenges found across the United States – demographics range from the dense urban cores of Philadelphia and Pittsburgh, to medium-sized cities, small towns and remote forests; our terrain ranges from coastal to mountainous; and our PSAPs include both some of the largest and smallest in the nation.

Based on this experience, here are some general observations on the successes and continuing challenges for E-9-1-1 Phase II services. Among the benefits of the current technology:

- On the positive side, the current technology works pretty well most of the time. Telecommunicators are generally able to identify callers within the prescribed accuracy parameters. While not as accurate as wireline location information, it is far better than the previous realm of Phase I and Phase 0 information.

- Wireless E-9-1-1 technology, combined with rising penetration rates among the U.S. population, provides PSAPs with better real-time incident information. The ability to speak with a wireless caller on the scene at a critical incident allows telecommunicators to provide continuous, real-time updates to first responders prior to their arrival. This live information allows first responders to arrive on-scene better protected and prepared.

While all those who have been involved in bringing us this measure of success should be commended for their hard work, challenges remain to be addressed by the industry:

- While Phase II information represented a great improvement over Phase I and Phase 0, the accuracy of location information presented to telecommunicators is still not ideal for first responders. Too often, first responders are left to "chase ghosts", because the location information is not accurate enough to direct them to a definitive location of an incident. These inefficient efforts waste the time and resources of the PSAP and the emergency personnel, drawing manpower from other emergencies. The current accuracy measurement standards allow this to happen because averaging over an entire state can allow for extremely poor accuracy in substantial areas, particularly in a large state such as Pennsylvania. PA APCO supports the consensus position among APCO and other public safety organizations that accuracy measurements are only significant and meaningful if conducted at the County or PSAP level, because this will ensure that every PSAP is receiving location information within the accuracy standards established by the Commission.

- Continuously improved accuracy should be the goal for the wireless carriers and the Commission. In an era of intense innovation and evolution of wireless handsets and networks, it seems as though research and development in location-based technology has stalled. Manufacturers and carriers can deliver smart phones which can take pictures, stream video and order pizza, with "an app" for everything. It would be great if more of that creativity and innovation were turned toward life-saving improvements.

- While not a direct function of accuracy, non-initialized phones continue to be a source of frustration. While these phones can dial 9-1-1, the PSAP cannot call back if the call is disconnected. This leads to great frustration and wasted resources for "no voice contact" calls that are disconnected or hung up when these callers cannot be located. Both the carriers and the Commission are silent when it comes to educating the public on the fact that non-initialized phones do not provide the measure of safety that users believe they are receiving. While initially well-intentioned, this Commission mandate may now be causing more harm than good.

- As noted above, wireless calls can provide more and better information for first responders. However, the downside to this technology is very high call volumes and overuse of 9-1-1 due to the convenience. While one call about the overturned vehicle on the interstate is life-saving, 200 calls to report that same incident overwhelm resources (not to mention those drivers who call 9-1-1 for directions or traffic information). This can lead to complacency among telecommunicators fielding a very high volume of non-emergency calls, and can cause a less-than-optimal response to real emergencies. Anything the Commission and the industry can do to educate the public about effective use of 9-1-1 can only help this problem.

PA APCO appreciates the opportunity to comment on this Docket, and we ask the Commission to continue to be vigilant in demanding the most accurate, efficient wireless E-9-1-1 technology which can be deployed to protect our citizens.

Sincerely,

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